

**UNITED STATES DISTRICT  
COURT NORTHERN DISTRICT  
OF OHIO EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*Michelle Frost, et al. v. Endo Health Solutions Inc. et al.*  
Case No. 1:18-OP-46327

**MDL No. 2804**

**Case No. 17-md-2804**

**Judge Dan Aaron Polster**

**DECLARATION OF EMILY ULLMAN IN SUPPORT OF DEFENDANTS'<sup>1</sup>  
OPPOSITION TO ASHLEY RACHEL DAWN POE'S MOTION TO INTERVENE AS  
PLAINTIFF AND CLASS REPRESENTATIVE**

I, Emily Ullman, declare as follows pursuant to 28 U.S.C. § 1746:


1. I am an attorney at the law firm of Covington & Burling LLP, counsel for Defendant McKesson Corporation. I am a member in good standing of the bars of the State of New York and the District of Columbia. I have personal knowledge of the facts set forth in this Declaration, which I make to place before the Court documents and information relevant to its determination of Ashley Rachel Dawn Poe's Motion to Intervene as Plaintiff and Class Representative.
2. Attached hereto as Exhibit A is a true and accurate copy of an email from David Cohen to Emily Ullman dated September 28, 2019.
3. Attached hereto as Exhibit B is a true and accurate copy of an excerpt of the transcript of the deposition of Erin Doyle taken January 24, 2020.

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<sup>1</sup> Several defendants named in this litigation are not subject to personal jurisdiction in this matter. This declaration is filed subject to and without waiving all defenses, including but not limited to lack of personal jurisdiction, failure of service of process, and ineffective service of process.

4. Attached hereto as Exhibit C is a true and accurate copy of an excerpt from an email thread culminating in an email from Marc Dann to David Cohen dated February 6, 2020.
5. Attached hereto as Exhibit D is a true and accurate copy of an email from Marc Dann to Emily Ullman dated February 6, 2020, redacted to exclude irrelevant and potentially confidential medical information.
6. Attached hereto as Exhibit E is a true and accurate copy of the Plaintiff Fact Sheet signed by Ashley Rachel Dawn Poe on February 20, 2020 and served on February 24, 2020.
7. Attached hereto as Exhibit F is a true and accurate copy of an excerpt of the Answers to Interrogatories served by Ms. Poe on February 25, 2020.
8. Attached hereto as Exhibit G is a true and accurate copy of an excerpt of the document production served by Ms. Poe on February 25, 2020.
9. On January 30, 2020, I was informed by NAS Plaintiffs' counsel Thomas Bilek during an in-person conversation that Michelle Frost intended to voluntarily dismiss her claim against Defendants.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Emily Ullman